UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Ocean Gate Chartering, Inc., Canada, 640 Lakeshore Dr., Suite 103 Dorval, Montreal, Quebec H9S 2B6	:	CASE NO.
-V-	:	
429 HOT DIPPED GALVANIZED COILS, *in rem*,	:	**VERIFIED COMPLAINT IN ADMIRALTY**

Plaintiff, Ocean Gate Chartering Inc., Canada, by and through its attorney's, Reeves McEwing LLP, hereby brings this *in rem* action against 429 Hot Dipped Galvanized Coils, and in support thereof avers as follows:

1. Plaintiff, Ocean Gate Chartering Inc., Canada ("Ocean Gate"), is a Canadian company with its principal place of business at 640 Lakeshore Dr., Dorval, Montreal, H9S 2B6, Canada.

2. Ocean Gate is the disponent owner of the M/V ZEALAND DELILAH, an ocean going cargo vessel.

3. On December 16, 2014, Ocean Gate sub-chartered the ZEALAND DELILAH to Ilva SPA, for the carriage of certain hot dipped galvanized steel coils from Genoa, Italy to Eddystone Pennsylvania. (*See* Charter Party, attached as Exhibit A).

4. Pursuant to the Charter Party, freight was to by paid to Ocean Gate within three (3) banking days of signing/releasing of bills of lading for the cargo. (*See* Exhibit A at pg. 4-5)

5. Two bills of lading for the cargo (429 Hot Dipped Galvanized Coils) were signed and released upon the vessel's sailing from Genoa, Italy on January 4, 2015. (*See* Bills of Lading, attached as Exhibit B).

6. The freight payable for the 429 Hot Dipped Galvanized Coils in the amount of $338,610.60 became due and owing upon issuance of the aforesaid bills of lading. (*See* Freight Invoice, attached as Exhibit C).

7. Despite demand, Ilva has not paid the freight to Plaintiff Ocean Gate. *Id*.

8. The ZEALAND DELILAH is scheduled to dock and discharge the coils at Penn Terminals in Eddystone, Pa. on January 20, 2015.

9. Pursuant to the Charter Party and maritime law, Ocean Gate has a maritime lien on the said cargo for non-payment of freight. (*See* Clause 8 of Charter Party Terms, Exhibit A at pg. 8).

10. Ocean Gate therefore brings this action *in rem* against 429 Hot Dipped Galvanized Coils, identified in the attached bills of lading, and currently on board the M/V ZEALAND DELILAH, which is now or will be within the jurisdiction of this Court during the pendency of this action.

11. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure over which the Court has jurisdiction under 28 U.S.C. § 1333.

WHEREFORE, Plaintiff Ocean Gate Chartering, Inc., Canada, hereby prays that:

1. Process in due form of law issue against 429 Hot Dipped Galvanized Coils, identified in the aforesaid bills of lading, according to the practice of this Court and the Supplemental Rules for Certain Admiralty and Maritime Claims;

2. All persons claiming an interest in and to said Coils be ordered to appear and answer under oath all and singular the matters aforesaid, and that said Coils be condemned and sold to pay the demands as aforesaid with interest and costs;

3. Judgment be entered in favor of Plaintiff and against said 429 Hot Dipped Galvanized Coils in the amount of $338, 610.60, plus interest, costs and attorney fees; and

4. This Court issue such other and further relief as may be appropriate under the circumstances.

REEVES McEWING, LLP

BY: Mary E. Reeves

MARY ELISA REEVES, ESQUIRE
719 E. Passyunk Avenue
Philadelphia, PA 19147
(267) 324-3773
Attorney Id #44194
reeves@lawofsea.com

Dated: January 20, 2015

VERIFICATION

I, Dimitar Kolev, hereby state that:

1. I am PRESIDENT of Ocean Gate Chartering, Inc., Canada.

2. I am authorized to sign this Verification.

3. I have read the allegations of the Verified Complaint in Admiralty. The information in that Complaint is true and correct to the best of my knowledge, information and belief. The basis of my knowledge is my own personal knowledge and the business records of Ocean Gate Chartering, Inc., Canada.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2015 at Montreal, Quebec, Canada.

Dimitar Kolev